



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

TBM/CWE/RMS
F. #2021R01073

*271 Cadman Plaza East
Brooklyn, New York 11201*

May 27, 2025

By ECF and Email

The Honorable LaShann DeArcy Hall
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Mark Goulbourne
Criminal Docket No. 22-106 (LDH)

Dear Judge DeArcy Hall:

The parties respectfully write to outline the motions currently outstanding, pending motions that the parties wish to supplement, and to identify mooted issues, in advance of trial scheduled to begin on June 16, 2025.

The following pending motions are ripe for decision, with the exception noted below of a now mooted issue:

- The government's motions in limine, ECF No. 268, which the defendant opposed, ECF No. 278.
- The defendant's motion in limine concerning discovery (Request I), ECF Nos. 266-67, which the government opposed, ECF No. 275. The defendant's motion in limine requesting a severance (Request II) is moot.
- Requests II and V of co-defendant Marcus Rickett's motions in limine, ECF No. 269, which the defendant joined, see ECF Nos. 338, and which the government opposed, ECF No. at 277.

The parties respectfully request leave to make supplement filings on or before June 2, 2025, to matters that were the subject of prior motions, and specifically:

- The government's motion to preclude the defendant's expert witness, ECF No. 305, which the defendant opposed, ECF No. 311. The defendant intends to provide an updated Federal Rule of Criminal Procedure 16 expert disclosure by June 2, 2025, at which time the government will modify its motion to preclude if appropriate.

- Co-defendant Marcus Ricketts's motion for, inter alia, additional disclosures pursuant to 18 U.S.C. § 3500 and Giglio v. United States, 405 U.S. 150 (1972), which the defendant joined, ECF No. 312, and which the government opposed, ECF No. 321, see also ECF No. 308. The government intends to make a supplemental production of material pursuant to § 3500 and Giglio on or before June 2, 2025.
- The defendant's objections to the government's exhibits and response to the government's Giglio letter, ECF No. 338, which the government opposed, ECF No. 351. The government intends to make a supplemental production of material pursuant to § 3500 and Giglio on or before June 2, 2025. The government will also provide an updated and modified exhibit list on or before June 2, 2025.

Finally, the parties respectfully request leave to file updated proposed jury instructions, verdict sheets, voir dire, witness lists, and lists of names and places on June 2, 2025.

Respectfully submitted,

JOSEPH NOCELLA, JR.
United States Attorney

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cc: Clerk of Court (LDH) (by ECF & email)
Counsel of Record (by ECF & email)